

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:)	Chapter 7
)	
EASTERN LIVESTOCK CO., LLC,)	Case No. 10-93904-BHL-11
)	
Debtor.)	Hon. Basil H. Lorch III

**MOTION PURSUANT TO FED. R. BANKR. P. 9006(c) FOR ORDER
SETTING MOTION TO APPROVE SALE AGREEMENT AND COMPROMISE OF
CLAIMS CONCERNING CATTLEMEN'S FEEDLOT, LTD. FOR HEARING ON
DECEMBER 14, 2011 ON SHORTENED AND LIMITED NOTICE**

James A. Knauer, as chapter 11 trustee (the "Trustee") for Eastern Livestock Co., LLC ("Debtor"), by counsel, hereby moves the Court for the entry of an order ("Order") setting an expedited hearing on the *Motion to Approve Sale Agreement and Compromise of Claims Concerning Cattlemen's Feedlot, Ltd.* [Dock. No. 865] (the "Approval Motion") filed with this Court on November 30, 2011 and shortening and limiting notice thereon. The relief requested in the Approval Motion is necessary on an expedited basis because the Buyer¹ requires that the transactions provided for in the Sale Agreement be closed by year end. Additionally, the Court's resolution of the Approval Motion will allow the Court to resolve without additional evidentiary hearings and costs the *Motion to Compromise and Settle with Cattlemen's Feedlot, Ltd.* (the "East West Approval Motion") that was filed on November 21, 2011 in Case No. 10-93799 pending before this Court as *In re: East West Trucking Co., LLC* (the "East West Case"). Absent approval of the Approval Motion, the Trustee will contest the relief requested in the East West Approval Motion, causing parties in interest in both this case and the East West Case to incur additional expense.

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Approval Motion.

In order to maximize Debtor's estate for the benefit of all creditors, the Trustee, pursuant to Fed. R. Bankr. P. 9006(c) and Local Bankruptcy Rule B-9006-1, requests that the Court set the Approval Motion for an immediate hearing and grant the Approval Motion in order to maximize the return on Debtor's assets and avoid irreparable harm to Debtor's estate. The Trustee further requests that the Court authorize parties in interest to participate telephonically in the hearing on the Approval Motion.

The Trustee will provide notice of the Approval Motion, the Order setting a hearing thereon and the telephonic dial-in number on the date that the Court enters such Order by electronic mail through the Court's CM/ECF system (if applicable) and overnight mail or electronic mail to all parties listed on the attached certificate of service.

WHEREFORE, the Trustee respectfully request that the Court enter an Order (1) setting the Approval Motion for hearing on December 14, 2011, (2) allowing telephonic participation therein, (3) shortening and limiting notice thereon and (4) granting the Trustee such other and further relief as is just and proper.

Respectfully submitted,

BAKER & DANIELS LLP

By: /s/ Dustin R. DeNeal

James M. Carr (#3128-49)
Kevin Toner (#11343-49)
Terry E. Hall (#22041-49)
Harmony Mappes (# 27237-49)
Dustin R. DeNeal (#27535-49)
300 N. Meridian Street, Suite 2700
Indianapolis, IN 46204-1782
Telephone: (317) 237-0300
Facsimile: (317) 237-1000
jim.carr@bakerd.com
kevin.toner@bakerd.com
terry.hall@bakerd.com
harmony.mappes@bakerd.com
dustin.deneal@bakerd.com

Counsel for James A. Knauer, Chapter 11 Trustee

Wendy W. Ponader (#14633-49)
Baker & Daniels LLP
600 East 96th Street, Suite 600
Indianapolis, IN 46240
wendy.ponader@bakerd.com

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2011, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

David L. Abt
davidabt@mwt.net

C. R. Bowles, Jr
crb@gdm.com

John Hunt Lovell
john@lovell-law.net

Mark A. Robinson
mrobinson@vhlaw.com

Jeffrey R. Erler
jeffe@bellnunnally.com

Edward M King
tking@fbtlaw.com

Randall D. LaTour
rdlatour@vorys.com

John R. Carr, III
jrciii@acs-law.com

Bret S. Clement
bclement@acs-law.com

Daniel J. Donnellon
ddonnellon@ficlaw.com

Stephen A. Weigand
sweigand@ficlaw.com

John Frederick Massouh
john.massouh@sprouselaw.com

John W. Ames
jwa@gdm.com

Robert Hughes Foree
robertforee@bellsouth.net

Kim Martin Lewis
kim.lewis@dinslaw.com

Jeremy S Rogers
Jeremy.Rogers@dinslaw.com

Meredith R. Thomas
mthomas@daleeke.com

Charles R. Wharton
Charles.R.Wharton@usdoj.gov

David L. LeBas
dlebas@namanhowell.com

Jessica E. Yates
jyates@swlaw.com

Laura Day Delcotto
ldelcotto@dlgfir.com

Ross A. Plourde
ross.plourde@mcafeetaft.com

Todd J. Johnston
tjohnston@mcjllp.com

Karen L. Lobring
lobring@msn.com

Elliott D. Levin
robin@rubin-levin.net
edl@trustesolutions.com
Sean T. White
swhite@hooverhull.com

Michael W. McClain
mike@kentuckytrial.com

James Edwin McGhee
mcghee@derbycitylaw.com

Jerald I. Ancel
jancel@taftlaw.com

David Alan Domina
dad@dominalaw.com

Jill Zengler Julian
Jill.Julian@usdoj.gov

Michael Wayne Oyler
moyler@rwsvlaw.com

James E. Rossow
jim@rubin-levin.net

Steven A. Brehm
sab@gdm.com

Ivana B. Shallcross
ibs@gdm.com

William Robert Meyer, II
rmeyer@stites.com

James Bryan Johnston
bjtexas59@hotmail.com

Judy Hamilton Morse
judy.morse@crowedunlevy.com

John Huffaker
john.huffaker@sprouselaw.com

Kelly Greene McConnell
lisahughes@givenspursley.com

Walter Scott Newbern
wsnewbern@msn.com

Timothy T. Pridmore
tpridmore@mcjllp.com

Sandra D. Freeburger
sfreeburger@dsf-atty.com

John M. Rogers
johnr@rubin-levin.net

Robert H. Foree
robertforee@bellsouth.net

William E Smith
wsmith@k-glaw.com

Thomas C Scherer
tscherer@binghamchale.com

Jeffrey J. Graham
jgraham@taftlaw.com

Kent A Britt
kabritt@vorys.com

Jeffrey L Hunter
jeff.hunter@usdoj.gov

Jason W. Cottrell
jwc@stuartlaw.com

James B. Lind
jblind@vorys.com

Deborah Caruso
dcaruso@daleeke.com

Allen Morris
amorris@stites.com

James T. Young
james@rubin-levin.net

John M. Thompson
john.thompson@crowedunlevy.com

Matthew J. Ochs
matt.ochs@moyewwhite.com

T. Kent Barber
kbarber@dlgfir.com

Kirk Crutcher
kcrutcher@mcs-law.com

Theodore A Konstantinopoulos
ndohbky@jbandr.com

Lisa Koch Bryant
courtmail@fbhlaw.net

John David Hoover
jdhoover@hooverhull.com

Sarah Stites Fanzini
sfanzini@hopperblackwell.com

Susan K. Roberts
skr@stuartlaw.com

David A. Laird
david.laird@moyewwhite.com

Trevor L. Earl
tearl@rwsvlaw.com

Joshua N. Stine
jnstine@vorys.com

Amelia Martin Adams
aadams@dlgfir.com

Robert A. Bell
rabell@vorys.com

Melissa S. Giberson
msgiberson@vorys.com

I further certify that on November 30, 2011, a copy of the foregoing pleading was served via electronic mail transmission on the following:

Ashley S. Rusher
asr@blancolaw.com

Darla J. Gabbitas
darla.gabbitas@moyewwhite.com

/s/ Dustin R. DeNeal